

REMARKS

This Preliminary Amendment is being filed before examination of the application and calculation of the filing fee. Applicant submits that independent claims 1, 11 and 19 overcome the § 103 rejections that are set forth in the Final Office Action dated September 20, 2004, for at least the following reasons. Additionally, claims 33 and 34 overcome the cited art for at least the reason that these claims depend from a patentable independent claim.

Rejections of Claims 1-10:

As amended, the method of independent claim 1 includes in response to a computer being in a predetermined sleep state, conducting a current from a supply voltage plane of the computer to ground in the absence of a voltage on the supply voltage plane to prevent a subsequent back-driven voltage on the supply voltage plane. Furthermore, as amended, the method of independent claim 1 states that in response to the computer being in a predetermined state other than the predetermined sleep state, halting the conduction of the current.

Contrary to the limitations of amended independent claim 1, all of the pull-down circuits disclosed in Price do not conduct a current when a non-zero voltage is on the power line. This is attributable due to the design of these circuits in that the circuits require a power supply line, a ground and low voltage line for purposes of operation. When the computer system powers up in Price, the energization of these ground and voltage lines de-activate the pull-down circuit so that the pull-down circuit does not create a conduction path when a voltage appears on the power line. However, when the computer is turned off, all of the transistor devices in the pull-down circuits of Price do not conduct a current until a voltage appears on the supply voltage line.

The arrangements disclosed in Price are to be contrasted with the method of independent claim 1. More particularly, the method of independent claim 1 recites that in the absence of a voltage on the supply voltage line, a current is conducted from the supply voltage plane of the computer to ground. A possible advantage of this arrangement is that multiple supply planes/voltage lines do not need to be powered off for purposes of preventing a back-driven voltage. Furthermore, a more rapid response may occur to a back-driven voltage, as current is already being conducted.

Thus, assuming, for purposes of argument, that the alleged admitted prior art (herein called the "AAPA") teaches, in general, the undesirability of a back-driven voltage during a sleep

state, neither the AAPA nor Price teaches or suggests the claimed invention. More specifically, the Examiner has not shown where the prior art contains a suggestion or motivation to modify any of the pull-down circuits of Price so that a current is conducted between the power line and ground in the absence of a back-driven voltage. Therefore, without such a teaching or suggestion in the art, Applicant submits that claim 1 is allowable.

Claims 2-10 are patentable for at least the reason that these claims depend from an allowable claim.

Rejections of Claims 11-32:

As amended, the computer of independent claim 11 and the system of independent claim 19 each includes a circuit that in response to a computer being in a predetermined sleep state, couple a load to conduct current from a supply voltage plane of the computer to ground in the absence of a voltage on the supply voltage plane to prevent a subsequent back-driven voltage on the supply voltage plane.

See discussion of independent claim 1 above. As discussed above, Price neither teaches nor suggests conduction of current between its power line and ground in the absence of a back-driven voltage. Furthermore, there is no teaching or suggestion in the AAPA of such a circuit to conduct current during a sleep state; and additionally, there is no teaching or suggestion in Price or the AAPA to modify any of the pull-down circuits in Price to derive the claimed invention.

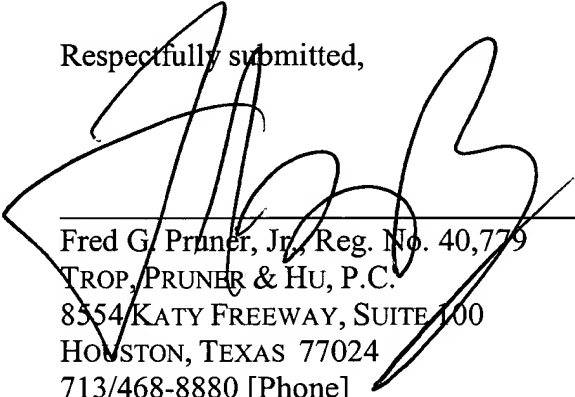
Therefore, allowance of independent claims 11 and 19 is requested. Claims 12-18 and 20-32 are patentable for at least the reason that these claims depend from an allowable claim.

CONCLUSION

In view of the foregoing, allowance of claims 1-34 is respectfully requested. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504 (ITL.0577US).

Respectfully submitted,

Date: December 20, 2004



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